

JAP: AL

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

12 M 605

- - - - -X

UNITED STATES OF AMERICA

- against -

C O M P L A I N T  
(21 U.S.C. §§ 952(a)  
and 960)

JEAN ROLEN ST. SURIN,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

GERARD MCMAHON, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 22, 2012, within the Eastern District of New York and elsewhere, defendant JEAN ROLEN ST. SURIN did knowingly, intentionally and unlawfully import into the United States from a place outside thereof cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.


1. At approximately 6:30 p.m. on June 22, 2012, defendant JEAN ROLEN ST. SURIN arrived at John F. Kennedy International Airport in Queens, New York, aboard American Airlines Flight No. 830 from Port Au Prince, Haiti.

2. The defendant JEAN ROLEN ST. SURIN was selected for a Customs and Border Protection ("CBP") examination. The defendant presented for inspection one piece of luggage, a Samsonite Bag. The defendant claimed ownership of the luggage and its contents.

3. During an examination of the Samsonite Bag, the CBP officer conducting the exam noticed that the bottom of the bag was unusually thick. The bottom of the bag was probed revealing a white powdery substance, which field-tested positive for cocaine.

4. The total approximate gross weight of the cocaine found in the defendant JEAN ROLEN ST. SURIN'S bag is 3,795 grams.

WHEREFORE, your deponent respectfully requests that  
defendant JEAN ROLEN ST. SURIN be dealt with according to law.

  
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GERARD MCMAHON  
Special Agent  
HSI

Sworn to before me this  
23<sup>rd</sup> day of June, 2012

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JUDGE  
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